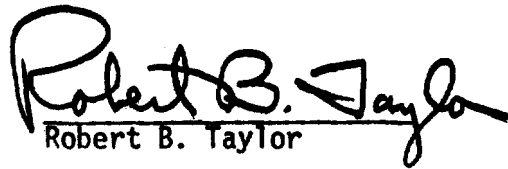
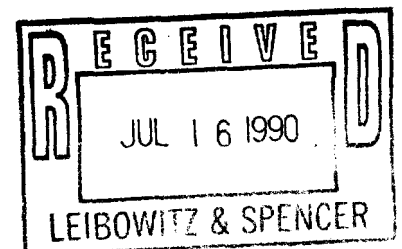


CERTIFICATE OF SERVICE

I, Robert B. Taylor, hereby certify that on this 21st day of July, 1989, a copy of the foregoing "Petition to Deny" was mailed by United States First Class mail, postage prepaid, to the following:

Paul J. Levine, Director
Jupiter Broadcasting Corp.
Grossman and Roth
Grand Bay Plaza, Penthouse 1
2665 S. Bayshore Dr.
Miami, FL 33133


Robert B. Taylor



LAW OFFICES

SPENCE, PAYNE, MASINGTON, GROSSMAN & NEEDLE, P. A.

SUITE 300, GROVE PROFESSIONAL BUILDING

2950 SOUTHWEST 27TH AVENUE

MIAMI, FLORIDA 33133

TELEPHONE (305) 447-0641

J. B. SPENCE
R. W. PAYNE, JR.
RICHARD S. MASINGTON
STUART Z. GROSSMAN
ANDREW NEEDLE
STEPHEN L. MALOVE
ROSALIND B. HERSCHTHAL
JOHN F. EVERSOLE III
CLAIRE B. FORD
PAUL J. LEVINE
OF COUNSEL

ISLAMORADA OFFICE
MILE MARKER 81.5
81581 OVERSEAS HIGHWAY
ISLAMORADA, FLORIDA 33036
(305) 664-4481
DIRECT FROM MIAMI: 381-9267

September 14, 1987

Federal Express

Personal & Confidential

Mr. Robert B. Taylor
WXKF-FM
2541 Goshen Road
Ft. Wayne, Indiana 46808

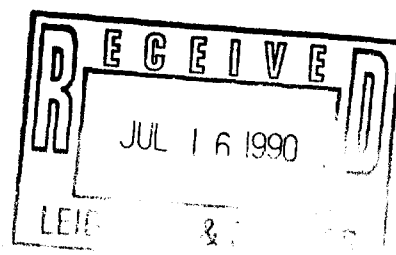
Dear Mr. Taylor:

I represent a group interested in purchasing the license of WKSX-FM and WTRU-AM in Jupiter, Florida. If you are interested in entertaining an offer, please contact me as soon as possible.

Sincerely,


Paul J. Levine

PJL/gb



LAW OFFICES

SPENCE, PAYNE, MASINGTON, GROSSMAN & NEEDLE, P. A.

SUITE 300, GROVE PROFESSIONAL BUILDING

2950 SOUTHWEST 27TH AVENUE

MIAMI, FLORIDA 33133

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MILE MARKER 81.5
81581 OVERSEAS HIGHWAY
ISLAMORADA, FLORIDA 33036
(305) 664-4481
DIRECT FROM MIAMI: 381-9267

November 6, 1987

Mr. Robert B. Taylor
P.O. Box 848
Jupiter, Florida 33458

Re: WKSJ-FM, WIXI-AM, Jupiter, Florida

Dear Mr. Taylor:

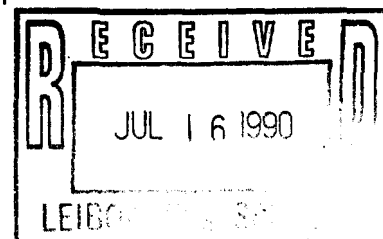
We represent a group that has a serious interest in purchasing your AM/FM combination in Jupiter. We understand that you intend to put the stations back on the air. We want you to know that our interest is sincere, that we are fully prepared to offer a sum as if the stations were currently on the air, and that we are capable of moving quickly.

We know that you have spurned prior offers for the stations but believe it would be advantageous for you to at least talk with us at your earliest opportunity. We look forward to hearing from you.

Sincerely,


Paul J. Levine

PJL/gb



LAW OFFICES

SPENCE, PAYNE, MASINGTON, GROSSMAN & NEEDLE, P.A.

SUITE 300, GROVE PROFESSIONAL BUILDING

2950 SOUTHWEST 27TH AVENUE

MIAMI, FLORIDA 33133

TELEPHONE (305) 447-0641

J. B. SPENCE
R. W. PAYNE, JR.
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JOHN F. EVERSOLE III
CLAIRE B. FORD
PAUL J. LEVINE
OF COUNSEL

ISLAMORADA OFFICE
MILE MARKER 81.5
81581 OVERSEAS HIGHWAY
ISLAMORADA, FLORIDA 33036
(305) 664-4481
DIRECT FROM MIAMI: 381-9267

February 3, 1988

Mr. Robert B. Taylor
P.O. Box 848
Jupiter, Florida 33468

Re: WKSJ-FM, WTRU-AM

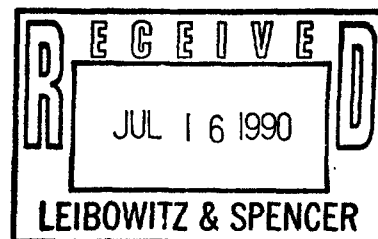
Dear Mr. Taylor:

I represent a group that is interested in purchasing stations licensed to U.S. Two Broadcasting Corp. and U.S. Three Broadcasting Corporation. This is a serious inquiry on behalf of a client with the ability to move quickly. We would appreciate hearing from you if you have any interest in selling the stations.

Sincerely,


Paul J. Levine

PJL/gb



Fcc file 10/2/80

Law Offices

Atkinson, Golden, Bacen & Diner

PROFESSIONAL ASSOCIATION

WILSON C. ATKINSON, III
STEPHEN F. BACEN
JESSE H. DINER
ERIC H. GOLDEN
BRYAN S. HENRY
CONSTANCE J. KAPLAN
MATTHEW L. LEIBOWITZ
ADELE I. STONE

POST OFFICE DRAWER 2088
1946 TYLER STREET
Hollywood, Florida 33022
TELEPHONE (305) 925-5501
MIAMI 944-1882

Tampa Office
SUITE 2B
200 NORTH PIERCE STREET
Tampa, Florida 33602
(813) 228-9800

October 3, 1980

Group One Broadcasting Corporation
Mr. Ron Winblad
100 North Delaware Avenue
Jupiter, FL 33458

Re: PSAs

Dear Ron:

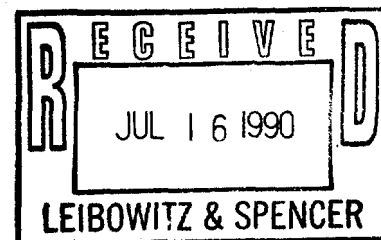
On September 26, 1980, the Commission adopted a new policy with respect to Public Service Announcements (PSAs). Broadcasters are now permitted to use PSAs for purposes of meeting the needs and problems of their community of license. Accordingly, it would now be proper to include PSAs as illustrative programming on your annual problems-programs list that you must place in your public file each year. In addition thereto, the Commission has decided to allow broadcasters to include PSAs in the "Other" programming category of the Annual Programming Report and for purposes of renewal applications. This will have the obvious effect of assisting you in meeting your proposed percentages of "other" programming.

Best wishes.

Sincerely yours,

Matthew L. Leibowitz
MATTHEW L. LEIBOWITZ

MLL/cg





KNAPE & VOGT MANUFACTURING CO.
2700 Oak Industrial Drive N.E.
Grand Rapids, MI 49505-6083 Phone: 616-459-3311

January 18, 1984

Mr. Matthew L. Leibowitz, P.A.
Suite 501
3050 Biscayne Boulevard
Miami, FL 33137

Dear Mr. Leibowitz:

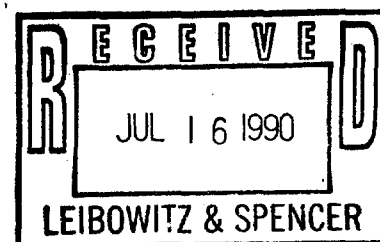
This is in response to your letter to me of January 13, 1984. I have decided to authorize R & R Broadcasting to pay your invoices of approximately \$3,973.43 sometime within the next thirty days.

As you know, I am in the process of acquiring Ron Winblad's interest in R & R Broadcasting. I am utilizing the FCC services of Wiley, Johnson & Rein (Jim Bayes) in Washington, D.C. Therefore, I will not need your future FCC services. Please do not render any services to R & R Broadcasting in the future without my express permission beforehand.


Very truly yours,

Raymond E. Knape
Raymond E. Knape

REK:sr
C: James Bayes
Rosemary Bristow



-20-6


Unforgettable

WVSI AM/FM
Radio

"THE STATION OF THE STARS"

February 6, 1984

Mr. Matthew L. Leibowitz, P.A.
3050 Biscayne Blvd., Suite 501
Miami, FL 33137

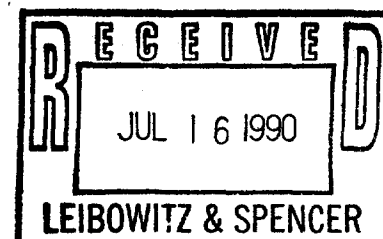
Dear Matt:

Enclosed please find our check in the amount
of \$3,973.43 as authorized for payment by
Mr. Raymond E. Knape.

This should close our account with you.

Sincerely,

Rosemary L. Bristow,
R. & R. Broadcasting



The Courier Journal

Serving our neighbors in Jupiter, Tequesta, Jupiter Farms, West Jupiter, Jupiter Inlet Colony, Juno Beach, and Hobe Sound

JUPITER, FLORIDA, WEDNESDAY, JANUARY 18, 1989

New limits may be considered for TV towers

By Yvette C. Hammett
Staff Writer

JUPITER — New limits could be placed on cable companies that want to add satellite dishes to their transmission towers.

After recently recommending approval of a 100-foot microwave television transmission and reception tower in Pennock Industrial Park, Planning & Zoning Commission members agreed new limits should be looked at for adding "further accessories" on such towers.

The commission voted unanimously to recommend that the Town

Council grant a special exception for the tower Telesat Cablevision Inc., because the tower would be located in the same area as two others.

However, concerns were expressed by several commission members that once these towers are allowed, some companies, in particular Jupiter Cablevision, have peppered them with additional satellite dishes, making them unsightly.

As a condition of the approval, the commission stipulated that no more than two satellite dishes could be placed on the tower.

Chuck Blaine, who represented

Telesat at the meeting, said such a condition should be no problem, because the tower will be built specifically for two dishes. To add more, he said, would require re-building the tower, "and we have no intention of doing that."

Commissioner Michael Tammaro commended Telesat for taking the time to seek a proper site for the tower. He said towers like the cable tower should be in industrial zones, a good distance from residences.

"We ought to take a look at what can be done to prevent additions of satellite dishes to the towers," Com-

mission Chairman Jerry Outlaw said.

The town attorney was directed to look into the town's legal footing.

Blaine said the tower is needed to upgrade the cable system.

"We're upgrading to increase channel capacity," he said. "To expand further, we needed a higher tower so we can bring in the Miami stations."

Adding the 100-foot tower will increase basic cable channels from 30 to 40, Blaine pointed out.

LEIBOWITZ & SPENCER
JUL 16 1990

Robert B. Taylor
Licenses, WTRU (FM)
500 N. Delaware Blvd.
Jupiter, FL 33458

Fold at line over top of envelope to the right
of the return address.

CERTIFIED

P 518 911 232

MAIL

Thank you for using
Return Receipt Service.

**RETURN RECEIPT
REQUESTED**

FIRST CLASS

Joseph A. Bellisio
Leibowitz & Spencer
Amerifirst Building, Suite 1450
One SE Third Avenue
Miami, FL 33131

A

In your RETURN ADDRESS
completed on the reverse side

DECLARATION OF
LAURA E. FAJARDO

My name is Laura E. Fajardo. On September 25, 1990, Leibowitz & Spencer received the following documents via Federal Express from Robert B. Taylor:

(a) Letter dated September 17, 1990 from Robert B. Taylor to Joseph A. Belisle;

(b) Application for Renewal of License for WKSJ(FM), Jupiter, Florida dated 9/22/88;

(c) Application for Renewal of License for WTRU(AM), Jupiter, Florida dated 9/22/88;

(d) Ownership Report for Station WKSJ(FM) dated 9/22/88;

(e) Annual Employment Report 1990 for Station WTRU(FM) dated 5/18/90;

(f) Annual Employment Report 1990 for Station WEXI dated 5/18/90;

(g) Letter dated 1/27/89 from Robert B. Taylor to Donna R. Searcy transmitting an opposition to petition to deny;


(h) Opposition to Petition to Deny dated 1/27/89 filed on behalf of Station WKSJ in FCC File No. BRH-880926UJ;

(i) Letter dated 1/3/89 from Nora E. Garrote to Donna R. Searcy transmitting a Petition to Deny the WSKY(FM) renewal application; and

(j) Petition to Deny the WSKY(FM) renewal application filed by Jose Oaks on 1/3/89.

These documents, comprising a total of 29 pages, were the entire contents of the Federal Express package sent to Joseph A. Belisle at Leibowitz and Spencer. These documents, the Federal Express Airbill and a memo I wrote to Joseph Belisle are attached hereto.

I declare under penalty of perjury that the foregoing is true.



Laura E. Fajardo

Received the attached documents on September 25, 1990 via Federal Express from Robert B. Taylor:

1. One page cover letter dated September 17, 1990 to Mr. Joseph A. Belisle.
2. On one page, two copies of form FCC 303-S for WKSJ and WTRU.
3. Ownership report for WSKY dated September 22, 1988.
4. Two page Broadcast Station Annual Employment Report, 1990 for WTRU.
5. One page Broadcast Station Annual Employment Report, 1990 for WEXI.
6. Sixteen page (inclusive) Opposition to Petition to Deny, with cover letter, and two exhibits, dated January 27, 1989.
7. Seven page (inclusive) Petition to Deny, with cover letter.



Laura E. Fajardo

WTRU 99.5 FM

The Palm Beaches True Adult Contemporary

September 17, 1990

Joseph A. Belisle
1 SE Third Ave., Suite 1450
Miami, FL 33131

Dear Mr. Belisle:

Your distortion of our telephone agreement of July 12, 1990, is reprehensible. I did agree to photocopy the public file and send it to you. I explained to you this would occur upon my return to Jupiter from Indiana where I operate another radio station. I returned today.

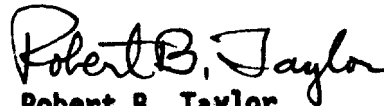
I consider your actions in this matter to be nothing short of harassment. I explained to you that the documents in the public file are the same as they were last year when your client's Paul Levine and Charles Reid examined these same papers.

Although you knew I was in Indiana and Michigan, you sent multiple Federal Express deliveries to my Jupiter office for no reason. You even insisted on harassing my employees by sending correspondence directly to my employee Steve May.

At this time I warn you: Do not contact my employees and do not attempt to interrupt my business.

Enclosed are copies of the other items in the public file. In the future you will get better results if you contact me directly and set up an appointment in advance.

Sincerely,



Robert B. Taylor
Licensee, WTRU & WEXI

RBT/ms

cc: Paul J. Levine

United States of America
Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0110
Expires 8/31/90

APPLICATION FOR RENEWAL OF LICENSE FOR COMMERCIAL AND NONCOMMERCIAL AM, FM OR TV BROADCAST STATION

1. Name of Applicant U.S. Three Broadcasting Corp.		Mailing Address 500 N. Delaware Blvd.	
Call Letters WKSJ (FM)	City Jupiter	State Florida	ZIP Code 33458

2. Have the following reports been filed with the Commission:
- (a) The Annual Employment Reports (FCC Form 395) as required by Section 73.3612 of the Commission's rules?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ an explanation.
- (b) The applicant's Ownership Report (FCC Form 323 or 323-E) as required by Section 73.3615 of the Commission's rules?
☒ Yes ☐ No If No, give the following information:
Date last ownership report was filed. _____
Call letters of the renewal application with which it was filed. _____
3. Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ an explanation.
4. Since the filing of the applicant's last renewal application for this station or other major application, has an adverse finding been made, a consent decree been entered or final action been approved by any court or administrative body with respect to the applicant or parties to the application concerning any civil or criminal suit, action or proceeding brought under the provisions of any federal, state, territorial or local law relating to the following: any felony; lotteries; unlawful restraints or monopolies; unlawful combinations; contracts or agreements in restraint of trade; the use of unfair methods of competition; fraud; unfair labor practices; or discrimination?
☐ Yes ☒ No
If Yes, attach as Exhibit No. _____ a full description, including identification of the court or administrative body, proceeding by file number, the person and matters involved, and the disposition of litigation.
5. Has the applicant placed in its public inspection file at the appropriate times the documentation required by Section 73.3526 or 73.3527 of the Commission's rules?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ a complete statement of explanation.

THE APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

THE APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 22nd day of September 1988

Name of Applicant U. S. Three Broadcasting Corp.

By Signature Robert B. Taylor

Title President/Robert B. Taylor

WILLFUL FALSE STATEMENTS MADE ON THIS FORM
ARE PUNISHABLE BY FINE AND IMPRISONMENT,
U.S. CODE, TITLE 18, SECTION 1001

United States of America
Federal Communications Commission
Washington, D.C. 20554

Approved by OMB
3060-0110
Expires 8/31/90

APPLICATION FOR RENEWAL OF LICENSE FOR COMMERCIAL AND NONCOMMERCIAL AM, FM OR TV BROADCAST STATION

1. Name of Applicant U.S. Two Broadcasting Corp.		Mailing Address 500 N. Delaware Blvd.	
Call Letters WTRU (AM)	City Jupiter	State Florida	ZIP Code 33458

2. Have the following reports been filed with the Commission:
- (a) The Annual Employment Reports (FCC Form 395) as required by Section 73.3612 of the Commission's rules?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ an explanation.
- (b) The applicant's Ownership Report (FCC Form 323 or 323-E) as required by Section 73.3615 of the Commission's rules?
☒ Yes ☐ No If No, give the following information:
Date last ownership report was filed. _____
Call letters of the renewal application with which it was filed. _____
3. Is the applicant in compliance with the provisions of Section 310 of the Communications Act of 1934, as amended, relating to interests of aliens and foreign governments?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ an explanation.
4. Since the filing of the applicant's last renewal application for this station or other major application, has an adverse finding been made, a consent decree been entered or final action been approved by any court or administrative body with respect to the applicant or parties to the application concerning any civil or criminal suit, action or proceeding brought under the provisions of any federal, state, territorial or local law relating to the following: any felony; lotteries; unlawful restraints or monopolies; unlawful combinations; contracts or agreements in restraint of trade; the use of unfair methods of competition; fraud; unfair labor practices; or discrimination?
☐ Yes ☒ No
If Yes, attach as Exhibit No. _____ a full description, including identification of the court or administrative body, proceeding by file number, the person and matters involved, and the disposition of litigation.
5. Has the applicant placed in its public inspection file at the appropriate times the documentation required by Section 73.3526 or 73.3527 of the Commission's rules?
☒ Yes ☐ No
If No, attach as Exhibit No. _____ a complete statement of explanation.

THE APPLICANT hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. (See Section 304 of the Communications Act of 1934, as amended.)

THE APPLICANT acknowledges that all the statements made in this application and attached exhibits are considered material representations and that all the exhibits are a material part hereof and are incorporated herein as set out in full in the application.

CERTIFICATION

I certify that the statements in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

Signed and dated this 22nd day of September 1988

Name of Applicant U.S. Two Broadcasting Corp.

By Signature Robert B. Taylor

Title President/Robert B. Taylor

WILLFUL FALSE STATEMENTS MADE ON THIS FORM
ARE PUNISHABLE BY FINE AND IMPRISONMENT,
U.S. CODE, TITLE 18, SECTION 1001

United States of America
Federal Communications Commission
Washington, D. C. 20554

Ownership Report

NOTE: Before filling out this form, read attached instructions

Section 310(d) of the Communications Act of 1934 requires that consent of the Commission must be obtained prior to the assignment or transfer of control of a station license or construction permit. This form may not be used to report or request an assignment of license/permit or transfer of control (except to report an assignment of license/permit or transfer of control made pursuant to prior Commission consent).

1. All of the information furnished in this Report is accurate as of

October 1, 19 88

(Date must comply with Section 73.3615(a), i.e., information must be current within 60 days of the filing of this report, when 1(a) below is checked.)

This report is filed pursuant to Instruction (check one)

1(a) ☒ Annual 1(b) ☐ Transfer of Control or Assignment of License 1(c) ☐ Other

or the following stations:

Call Letters	Location	Class of service
WKSJ (FM)	Jupiter, Florida	FM

Give the name of any corporation or other entity for whom a separate Report is filed due to its interest in the subject licensee (See Instruction 3):

None

3. Show the attributable interests in any other broadcast station of the respondent. Also, show any interest of the respondent, whether or not attributable, which is 5% or more of the ownership of any other broadcast station or any newspaper or CATV entity in the same market or with overlapping signals in the same broadcast service, as described in Sections 73.3555 and 76.501 of the Commission's Rules.

None

CERTIFICATION

I certify that I am President

(Official title, see Instruction 1)

of U.S. Three Broadcasting Corporation

(Exact legal title or name of respondent)

that I have examined this Report, that to the best of my knowledge and belief, all statements in the Report are true, correct and complete.

(Date of certification must be within 60 days of the date shown in Item 1 and in no event prior to Item 1 date):

Robert B. Taylor
(Signature)

September 22, 19 88
(Date)

Robert B. Taylor

Telephone No. of respondent (include area code):

(407) 746-5191

Any person who willfully makes false statements on this report can be punished by fine or imprisonment. U.S. Code, Title 18, Section 1001.

Name and Post Office Address of respondent:

U.S. Three Broadcasting Corporation
WKSJ (FM)
500 N. Delaware Blvd.
Jupiter, FL 33458

4. Name of entity, if other than licensee or permittee, for which report is filed (see Instruction 3):

None

5. Respondent is:

☐ Sole Proprietorship

☒ For-profit corporation

☐ Not-for-profit corporation

☐ General Partnership

☐ Limited Partnership

☐ Other: _____

If a limited partnership, is certification statement included as in Instruction 4?

☐ Yes

☐ No

BROADCAST STATION
ANNUAL EMPLOYMENT REPORT 1990

Approved by OMB
3080-0390
Expires 9/30/90

(For FCC Use Only)

Code No.

SECTION I

A. Name of Licensee or Permittee ROBERT B. TAYLOR	B. Address 500 N. DELAWARE BLVD. JUPITER, FL 33458
---	--

SECTION II

A. TYPE OF RESPONDENT (check one)

COMMERCIAL BROADCAST STATION

NONCOMMERCIAL BROADCAST STATION

AM ☐ AM

TV ☐ TV

ER ☐ Educational AM or FM Radio

FM ☒ FM

LP ☐ Low Power TV

ET ☐ Educational TV

AF ☐ Combined AM & FM
in same area

IN ☐ International

HQ ☐ Headquarters (Name and Location) _____

ZIP Code _____

B. LIST CALL LETTERS AND LOCATION(S) OF INCLUDED STATIONS

CALL LETTERS	LOCATION(S)
WTPH	JUPITER, FL 33458
THE STATION HAS NO CALL LETTERS, FOR THE 2 CALL LETTERS WERE WIKSY.	

CALL LETTERS	LOCATION(S)

SECTION III

A. PAY PERIOD COVERED BY THIS REPORT (DATE)

MARCH 11-24, 1990

B. CHECK APPLICABLE BOX

☐ Fewer than five full-time employees during the selected payroll period (Complete page one only and certification statement and return to FCC)

☒ Five or more full-time employees during selected payroll period (Complete all sections of form and certification statement and return to FCC)

SECTION IV CERTIFICATION

This report must be certified, as follows: (a) By licensee, if an individual; (b) By a partner, if a partnership (general partner, if a limited partnership); (c) By an officer, if a corporation or an association; or (d) By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.

U.S. CODE, TITLE 18, SECTION 1001.

I certify to the best of my knowledge, information, and belief, all statements contained in this report are true and correct.

Signed

Robert B. Taylor

Title

LICENSEE

Print Name

ROBERT B. TAYLOR

Date

5-18-90

Telephone No.

(407) 744-6398

SECTION V - EMPLOYEE DATA

FULL-TIME PAID EMPLOYEE DATA		MALE					FEMALE				
JOB CATEGORIES	TOTAL (a-j)	WHITE (NOT HISPANIC) (a)	BLACK (NOT HISPANIC) (b)	HISPANIC (c)	ASIAN OR PACIFIC ISLANDER (d)	AMERICAN INDIAN, ALASKAN NATIVE (e)	WHITE (NOT HISPANIC) (f)	BLACK (NOT HISPANIC) (g)	HISPANIC (h)	ASIAN OR PACIFIC ISLANDER (i)	AMERICAN INDIAN, ALASKAN NATIVE (j)
OFFICIALS & MANAGERS	2	2									
PROFESSIONALS	2	1					1				
TECHNICIANS											
SALES WORKERS	2	1					1				
OFFICE & CLERICAL											
CRAFT WORKERS (SKILLED)											
OPERATIVES (SEMI-SKILLED)											
LABORERS (UNSKILLED)											
SERVICE WORKERS											
TOTAL	6	4					2				

PART-TIME PAID EMPLOYEE DATA		MALE					FEMALE				
JOB CATEGORIES	TOTAL (a-j)	WHITE (NOT HISPANIC) (a)	BLACK (NOT HISPANIC) (b)	HISPANIC (c)	ASIAN OR PACIFIC ISLANDER (d)	AMERICAN INDIAN, ALASKAN NATIVE (e)	WHITE (NOT HISPANIC) (f)	BLACK (NOT HISPANIC) (g)	HISPANIC (h)	ASIAN OR PACIFIC ISLANDER (i)	AMERICAN INDIAN, ALASKAN NATIVE (j)
OFFICIALS & MANAGERS											
PROFESSIONALS	1							1			
TECHNICIANS											
SALES WORKERS											
OFFICE & CLERICAL											
CRAFT WORKERS (SKILLED)											
OPERATIVES (SEMI-SKILLED)											
LABORERS (UNSKILLED)											
SERVICE WORKERS											
TOTAL	1							1			

BROADCAST STATION
ANNUAL EMPLOYMENT REPORT 1990

Approved by OMB
3080-0390
Expires 9/30/90

(For FCC Use Only)

Code No.

SECTION I

A. Name of Licensee or Permittee <u>ROBERT B. TAYLOR</u>	B. Address <u>500 N. DELAWARE BLVD</u> <u>JUPITER, FL 33458</u>
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SECTION II

A. TYPE OF RESPONDENT (check one)

COMMERCIAL BROADCAST STATION

NONCOMMERCIAL BROADCAST STATION

AM ☒ AM

TV ☐ TV

ER ☐ Educational AM or FM Radio

FM ☐ FM

LP ☐ Low Power TV

ET ☐ Educational TV

AF ☐ Combined AM & FM
in same area

IN ☐ International

HQ ☐ Headquarters (Name and Location) _____

ZIP Code _____

B. LIST CALL LETTERS AND LOCATION(S) OF INCLUDED STATIONS

CALL LETTERS	LOCATION(S)
WEXI	JUPITER, FL
THESE ARE NEW CALL LETTERS, FORMER CALL LETTERS WERE <u>WZIP</u> AND BEFORE THAT, <u>WTRU</u> .	

SECTION III

A. PAY PERIOD COVERED BY THIS REPORT (DATE)

MARCH 11-24, 1990

B. CHECK APPLICABLE BOX

☒ Fewer than five full-time employees during the selected payroll period (Complete page one only and certification statement and return to FCC)

☐ Five or more full-time employees during selected payroll period (Complete all sections of form and certification statement and return to FCC)

SECTION IV CERTIFICATION

This report must be certified, as follows: (a) By licensee, if an individual; (b) By a partner, if a partnership (general partner, if a limited partnership); (c) By an officer, if a corporation or an association; or (d) By an attorney of the licensee, in case of physical disability or absence from the United States of the licensee.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IMPRISONMENT.

U.S. CODE, TITLE 18, SECTION 1001.

I certify to the best of my knowledge, information, and belief, all statements contained in this report are true and correct.

Signed

Robert B. Taylor

Title

LICENSEE

Print Name

ROBERT B. TAYLOR

Date

5-18-90

Telephone No.

(407) 744-6398

January 27, 1989

Robert B. Taylor, Licensee
WKSX (FM)
500 North Delaware Blvd.
P.O. Box 848
Jupiter, Florida 33458

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: File No. BRH-880926UJ

Dear Ms. Searcy:

Please find enclosed for filing the original and two copies
of an "Opposition To Petition To Deny."

This is in reply to a "Petition To Deny" filed on January 3,
1989, by Jose Oaks.

Please call the undersigned at (407) 744-6398 should there
be any question about this matter.

Sincerely,

Robert B. Taylor

RBT:cft

Enclosures

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In re Application of

U.S. Three Broadcasting Corp.
(Robert B. Taylor)

For Renewal of License of
FM Station WKSJ,
Jupiter, Florida

File No. BRH-880926UJ

To: Chief, Mass Media Bureau

OPPOSITION TO PETITION TO DENY

1) "Jose Oaks" ("Petitioner"), asserts in his Petition To Deny that he "resides seasonally and has a place of business within the listening area of WKSJ." With that statement, Mr. Oaks has tried to deliberately mislead the Commission. In fact, Mr. Oaks is not a legal resident of the state of Florida, and the addresses he gives in Boca Raton are not within the WKSJ coverage area. Under FCC rules, the usable coverage area of an FM station extends only to the station's 1 Mv/M or 60 dbu circle. The "local" addresses given by Mr. Oaks are approximately 42 miles south of the WKSJ tower site in Jupiter, or approximately 27 miles beyond the coverage area of WKSJ.

2) a) The Commission should be aware that "Jose Oaks" Petition To Deny is a sham and an abuse of the Commission's rules. "Jose Oaks" is a front for a man named Kenneth Dawson whose home address is 6479 Las Flores Drive, Boca Raton, Florida 33433. In his Petition To Deny, "Jose Oaks" gives the Commission a sworn statement that he has "seasonally resided at 6479 Las Flores Drive, Boca Raton, Florida 33433, during this past year."

Since this is the personal residence of Kenneth Dawson where Dawson lives with his wife and children, apparently "Jose Oaks" means that when he came down to Florida to visit last winter he stayed overnight in the guest bedroom at Dawson's house. This hardly makes him a resident. Yet he is attempting to mislead the Commission into believing that he is a Florida resident and lives within the WKSJ coverage area, when neither is true.

b) All the material presented in "Jose Oaks" Petition To Deny was assembled and prepared by Kenneth Dawson. On October 21, 1988, Dawson, by his attorney, Nora E. Garrotte of Piper & Marbury (the same attorney he used to prepare the "Jose Oaks" Petition To Deny), filed with the secretary of the Commission a pleading entitled "Reply Comments In Opposition To Counter-proposal of U.S. Three Broadcasting Corporation" as part of MM Docket No. 88-366, RM-6260, which contains the exact same charges, allegations, and exhibits that have been presented to the Commission a second time as "Jose Oaks" Petition To Deny.

c) Kenneth Dawson's motive is money. He wants a payoff. He wants me to pay him. He's using the Commission's processes to achieve his own personal financial gain. Here is what happened:

Fall 1986. Dawson approached me at the WKSJ office in Jupiter asking for employment. I politely turned down his offer. He then asked me to sell the stations to him.

April 22, 1988. Dawson sent me a letter (Exhibit 1).
In the last paragraph on the first page, Dawson states

that "under my direction" (Dawson's direction) the Jupiter stations could become successful. While he doesn't make it clear whether he is seeking employment or seeking to purchase the stations, he is apparently asking me to sell to him because on page 2 of his letter he discusses financing.

November 22, 1988. Kenneth Dawson and I met for an hour at Denny's Restaurant, 4102 Blue Heron Blvd., Riviera Beach, Florida. During this meeting Dawson suggested to me that the same material he had filed in his October 21, 1988 pleading (see b above) would be used against me as part of the FCC license renewal process for WKSJ (FM), Jupiter, unless I agreed to employ him as manager of the Jupiter FM and agreed to allow him to purchase stock in the licensee corporation equaling 20% to 25% of the equity.

November 27, 1988. On this date and another day in early December 1988 Dawson telephoned me at the WKSJ office and repeated his demands. He again threatened to take action against my license if I didn't capitulate. He pointed out that he had to file at the FCC by the end of December so I should accede to his demands now in order to avoid his filing.

January 3, 1989. Dawson files the Petition To Deny

using the name "Jose Oaks."

January 20, 1989. On this date Dawson again telephoned me at the WKSJ office. Admitting to me verbally that he had filed the "Jose Oaks" Petition To Deny, Dawson told me he would withdraw his Petition at the FCC if I paid him and hired him. In effect he is using the FCC procedures to blackmail me.

3) "Jose Oaks" again attempted to give false information to the Commission on page 3 of his Petition. "Oaks" states: "Each complaint contains similar allegations that...applicant fraudulently used the station's facilities to promote applicant-sponsored contests for which prizes were openly promised but never awarded." Here, "Oaks" is again deliberately trying to mislead the Commission as to what the complaints contain. In fact, none of the complaints contain allegations as "Oaks" describes them.

a) None of the complaints allege that contests were promoted on WKSJ. Instead, the complaints allege that WKSJ advertised and conducted a series of listener parties. "Oaks" is trying to mislead the Commission into believing that advertising listener parties on WKSJ was the same as advertising contests. The word contest does not appear in the complaints (or in the WKSJ advertisements).

b) With his statement, "Oaks" is also trying to mislead the Commission that WKSJ did not deliver prizes that were awarded. The complaints do not suggest this. The complaints refer to four specifically described